

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: June 19, 2001/ 3:30 p.m.

Site Contact(s): Ted A. Hopkins
Phone: 303-966-7652

Regulatory Contact: James Hindman
Phone: 303-692-3345

Agency: CDPHE

Purpose of Contact: Approval for staging of RCRA hazardous waste containers in Room 144, B776 during repack operations as described below.

Discussion

Room 144, B776
CERCLA Unit 5103

I discussed the staging and repacking of RCRA legacy waste in Room 144, B776, with Mr. James Hindman, CDPHE on June 19th and 21st. As agreed a written description of the proposal was submitted to Mr. Hindman on June 19th. After review of the repacking operation, Mr. Hindman approved the repack operations as described below.

Room 144 was selected as the repack location for LLM/LLW because of good ventilation/air flow in the room. TRU/TRM will not be repacked in this area. The repack operations require the following personnel: RCT; waste inspector; and three to four repack specialists. All personnel will be in full-face respirators during repack operations. Repack operations will occur on one container at a time. Containers will remain in this area for no more than 24 hours. At no time will the container be unattended. When the repack is complete the container is TID'd and moved to permitted storage.

The purpose of this repack is to correct NCRs. Typical materials causing NCRs include: nonconforming items such as unpunctured aerosol cans and free liquids (small amounts of liquids in containers and or plastic bags). These incidental free liquids will be treated with the addition of absorbent provided the liquid being treated meets the following criteria:

- A volume limit of no more than 100 ml; and
- Not containerized.

Contact Record 4/10/00
Rev. 10/11/00

DOCUMENT CLASSIFICATION
REVIEWED BY PER
CLASSIFICATION OFFICE

Page 1 of 2



ADMIN RECORD

B776-A-000068

1/2

Non-conforming items such as batteries, lightbulbs, circuit boards, and containerized liquids will be bagged-out, characterized and managed appropriately.

The repack process has been field tested on TRU waste in the MDA and proven to be effective. The following is a brief description of the repack process:

- Move drum from permitted storage to Room 144;
- Remove lid and rigid liner lid (if present);
- Attach drum bag (24" O-ring) to drum. This bag has a 10" bag out bag to remove nonconforming items and four glove ports that provide access to the old legacy drum. The glove ports and drum bag provide the ability to move items from the legacy drum to a new waste drum staged for this purpose;
- Remove all items in legacy drum and inspect for conformance with site waste packaging procedures for appropriate IDC;
- Conforming items are placed in new waste container;
- Non-conforming items are bagged out;
- Absorbent is added to small amounts (<100 ml) of moisture/free liquids found in bags and containers. The absorbed liquids are then placed in the new waste container. Note: Containerized liquids will not be absorbed.
- When all waste items have been inspected and dispositioned, a bag cut is done on the drum bag to separate the new waste container from the old. Both will remain sealed during this operation.
- The new waste container is then moved to a permitted area. The old waste drum is managed as LLW empty container.

Contact Record Prepared By: Ted A. Hopkins

Required Distribution:

R. DiSalvo, RFFO
D. Grosek, RFFO
J. Legare, RFFO
C. Burbach, CDPHE
S. Gunderson, CDPHE
T. Rehder, USEPA
P. Arnold, K-H 371
J. Berardini, K-H MS
C. Deck, K-H
C. Gilbreath, K-H 771
T. Hopkins, K-H 776
K. Lavorato, K-H 707
S. Nesta, K-H RISS

Additional Distribution:

G. Scott, K-H
D. Shelton, K-H
K. North, K-H ESS
A. Rosenman, K-H ESS
W. Wierzbicki, K-H ESS
J. Dischinger, RFCSS